

The recent "Notice of Oral Ex Parte Presentation, RM-11306" by the ARRL seems to include a significant alternation of proposed rules that may be outside the scope of their original submission in this proceeding.

The ARRL proposal includes the following:

"97.221 Automatically controlled stations transmitting RTTY or data emissions.

( c ) A station transmitting a RTTY or data emission may be automatically controlled on any other frequency authorized for such emissions provided that the station is responding to interrogation by a station under local or remote control."

This would seem to allow automatically controlled stations, specifically wide-band modes such as Pactor III stations of the Winlink e-mail service, to operate anywhere within the existing CW/Data subbands.

As someone who already has been interfered with by Pactor stations that seem to think they can step on existing QSOs and cannot be identified, I am very concerned about allowing expansion of automatic activity throughout the CW/Data bands. Automatic operating, either fully automatic or "responding to interrogation", cannot coexist with conversational modes. It must be segregated.

I object to this disingenuous effort by the ARRL to circumvent the formal proceeding process via ex-parte presentation activity. Especially when done without notification to their own membership or the amateur radio community at large. ARRL membership comprises less than 20% of licensed amateurs. The clique within the ARRL that wants to change amateur radio service into an e-mail service is a tiny minority of even that small fraction.